

**Before the
Federal Communications Commission
Washington DC 20554**

)	
Request for Form 471 Submission)	
Deadline Waiver for Montgomery)	Form 471 Number 161043917
County Public Schools)	
Troy, NC)	
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	
)	

Request for Waiver

In accordance with Sections 54.719 through 54.721 of the Commission's Rules, King Montgomery County Schools (Montgomery), through its consultant, requests the waiver of the Form 471 filing deadline for Fund Year 2016. Consistent with precedent in the Academy for Academic Excellence, we ask the Commission to grant this waiver request.¹

Montgomery County Public Schools (filing as consortium)

Billed Entity Number: 162994

FCC Registration Number: 0011654100

Form 471 Number: 161043917

Background

Montgomery County Schools contracted with E-rate Services, LLC to file their 2016-2017 applications. This school system utilizes the state of NC's voice contracts provided through the NC Office of Information Technology Services (NCOITS). These 471 applications are filed by the school systems or their designated consultant via the NCOITS EPC portal. During this filing cycle, the senior consultant was diagnosed with cancer.

The state released the new contract information required for completing the local voice service at 5:26 p.m. on May 23. A draft 471 for Montgomery to proof was sent at 11:30 p.m. on

¹ Academy for Academic Excellence, DA 07-1180, Rel. March 9, 2007, CC Docket No. 02-6

the 23rd (attached). The senior consultant was receiving chemo treatment during this time. The wrong draft 471 was submitted. It wasn't until NCOITS checked on November 16th that we knew the correct 471 had not been submitted.

The chief consultant had surgery for breast cancer in February 2016. The oncologist cautioned E-rate applications couldn't be filed while getting treatments because of "chemo brain". Treatment was postponed until early May when the 471 filing window was initially to close. Treatments could not be put off an additional month when the window was extended.

The combination of the medical condition and the learning curve required using the NCOITS EPC portal created the perfect storm. E-rate precautions the consulting firm typically has in place were not options at that time.

Discussion

The Commission recognizes that in some limited circumstances Form 471 deadline waiver is warranted. Specifically, waiver is justified when late filing is due to circumstances beyond the applicants' control such as staff illness or relatives.² In this case, the Form 471 was complete except for certification. Because of Montgomery's consultant cancer treatment and associated and documented cognitive issues, the certification confirmation was overlooked. Compounding the problem was the new EPC Portal and problems associated with submission of applications and certifications. In previous years, the consultant was able to verify submission of applications using the Administrator's Data Retrieval Tool. For Fund Year 2016, that tool was not available until well after close of the filing window.

Conclusion

The Montgomery situation falls within the parameters of Academy of Academic Excellence. Montgomery asks the Commission to allow 471 application #161043917 to be

² Academy for Academic Excellence at 4.

considered filed within the 2016 E-Rate filing window.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Cindy Johnson".

Cindy Johnson
E-rate Services, LLC
919-353-1723
919-775-1421 (fax)



Description of Services Ordered and Certification DRAFT Form 471

FCC Form 471

Application Information

Nickname	Montgomery Local & LD - DIT	Application Number	161043917
Funding Year	2016	Category of Service	Category 1

Billed Entity

NORTH CAROLINA OFFICE OF INFORMATION T
ECHNOLOGY SERVICES
3700 WAKE FOREST ROAD, PO BOX 17209 RAL
EIGH NC 27619 - 7209
919-754-6347

Contact Information

Rodney Neal
910-576-6511
dit.mcs@montgomery.k12.nc.us

Billed Entity Number	162994
FCC Registration Number	0011654100
Applicant Type	Consortium

Holiday/Summer Contact
Information

erate@erateservices.com

Entity Information

Consortium Entities

Related School District Entity - Details

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	School District Attributes	Endowment
126844	MONTGOMERY COUNTY SCHOOL DIST	Rural				Public School District	None

Related Entity Information

Consortium Related Entities

Related Child School Entity - Details

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
27825	EAST MIDDLE SCHOOL	Rural				None	Public School	None
27826	EAST MONTGOMERY HIGH SCHOOL	Rural				None	Public School	None
27849	CANDOR ELEMENTARY SCHOOL	Rural				None	Pre-K; Public School	None

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
27978	MOUNT GILEAD ELEMENTARY SCHOOL	Rural				None	Pre-K; Public School	None
27979	WEST MONTGOMERY HIGH SCHOOL	Rural				None	Public School	None
27980	WEST MIDDLE SCHOOL	Rural				None	Public School	None
28050	STAR BISCOE ELEMENTARY SCHOOL	Rural				None	Pre-K; Public School	None
28072	TROY ELEMENTARY SCHOOL	Rural				None	Pre-K; Public School	None
225110	PAGE STREET ELEMENTARY	Rural				None	Public School	None
16046851	MONTGOMERY LEARNING ACADEMY	Rural				None	Public School	None
16046870	GREEN RIDGE ELEM SCHOOL	Rural				None	Pre-K; Public School	None

Related Child School Entity - Discount Rate Calculation Details

BEN	Name	Urban/ Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
27825	EAST MIDDLE SCHOOL	Rural	435	N/A	
27826	EAST MONTGOMERY HIGH SCHOOL	Rural	661	N/A	
27849	CANDOR ELEMENTARY SCHOOL	Rural	375	N/A	
27978	MOUNT GILEAD ELEMENTARY SCHOOL	Rural	327	N/A	
27979	WEST MONTGOMERY HIGH SCHOOL	Rural	584	N/A	
27980	WEST MIDDLE SCHOOL	Rural	429	N/A	
28050	STAR BISCOE ELEMENTARY SCHOOL	Rural	249	N/A	
28072	TROY ELEMENTARY SCHOOL	Rural	269	N/A	
225110	PAGE STREET ELEMENTARY	Rural	285	N/A	
16046851	MONTGOMERY LEARNING ACADEMY	Rural	48	N/A	
16046870	GREEN RIDGE ELEM SCHOOL	Rural	547	N/A	

Related School District NIFs

School District BEN	School District Name	NIF BEN	NIF Name
126844	MONTGOMERY COUNTY SCHOOL DIST	16033133	MONTGOMERY COUNTY DISTRICT OFFICE

Discount Rate

Category One Discount Rate	Category Two Discount Rate	Voice Discount Rate
90%	85%	50%

School District Discount Rate

School District Enrollment	School District NSLP Count	School District NSLP Percentage	School District Urban/ Rural Status	Category One Discount Rate	Category Two Discount Rate	Voice Discount Rate
4209	3170	76.0%	Rural	90%	85%	50%

Funding Request for FRN #1699097034

Funding Request Nickname: Long Distance

Service Type: Voice

Agreement Information - Contract

Contract Number ITS-004729

Establishing FCC Form 470 160007778

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Award Date January 25, 2016

How many bids were received for this contract? 0

What is the service start date? July 01, 2016

Account Number 910.576.6511

Service Provider AT&T Corp. (SPN: 143001192)

Based on State Master Contract? Yes

Based on a multiple award schedule? Yes

Includes Voluntary Extensions? No

Remaining Voluntary Extensions

Total Remaining Contract Length

What is the date your contract expires for the current term of the contract? June 30, 2018

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative

Long distance service from AT&T via the DIT state master contracts. The school district has no information as to if the state master contract will be extended. The upload contracts feature was not designed for state master contracts. We entered the data the best we could using the information available from senior USAC staff, DPI and DIT.

Line Item # 1699097034.001

Product and Service Details

Function Voice

Type of Connection Long Distance Phone Service Only

Cost Calculation for FRN Line Item # 1699097034.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$230.29	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$230.29	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 1	One-time Quantity	x 0
		Total Eligible One-time Costs	= \$0.00

Total Monthly Eligible Recurring Costs	= \$230.29
Months of Service	x 12
Total Eligible Recurring Costs	= \$2,763.48

Summary	
Total Eligible Recurring Costs	\$2,763.48
Total Eligible One-time Costs	+ \$0.00
Pre-Discount Extended Eligible Line Item Cost	= \$2,763.48

Recipients of Services

BEN	Name
27825	EAST MIDDLE SCHOOL
27826	EAST MONTGOMERY HIGH SCHOOL
27849	CANDOR ELEMENTARY SCHOOL
27978	MOUNT GILEAD ELEMENTARY SCHOOL
27979	WEST MONTGOMERY HIGH SCHOOL
27980	WEST MIDDLE SCHOOL
28050	STAR BISCOE ELEMENTARY SCHOOL
28072	TROY ELEMENTARY SCHOOL
225110	PAGE STREET ELEMENTARY
16046851	MONTGOMERY LEARNING ACADEMY
16046870	GREEN RIDGE ELEM SCHOOL
16033133	MONTGOMERY COUNTY DISTRICT OFFICE

FRN Calculation for FRN #1699097034

Monthly Charges	
Total Monthly Recurring Charges	\$230.29
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$230.29
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$2,763.48

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$2,763.48
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$2,763.48
Discount Rate	50%
Funding Commitment Request	= \$1,381.74

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Funding Request for FRN #1699114434

Funding Request Nickname: CenturyLink Local - July to December

Service Type: Voice

Agreement Information - Contract

Contract Number ITS-004467

Account Number

910.576.6511

Establishing FCC Form 470 160007778

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Award Date January 25, 2016

How many bids were received for this contract? 0

What is the service start date? July 01, 2016

Service Provider CenturyLink Carolina Telephone and Telegraph Co FKA Embarq (SPN: 143001484)

Based on State Master Contract? Yes

Based on a multiple award schedule? Yes

Includes Voluntary Extensions? No

Remaining Voluntary Extensions

Total Remaining Contract Length

What is the date your contract expires for the current term of the contract? December 31, 2016

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative

Local voice service for 150 users

Line Item # 1699114434.001

Product and Service Details

Function Voice

Type of Connection Local Phone Service Only

Cost Calculation for FRN Line Item # 1699114434.001

Monthly Cost	
Monthly Recurring Unit Cost	\$2,669.15
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$2,669.15
Monthly Quantity	x 1
Total Monthly Eligible Recurring Costs	= \$2,669.15
Months of Service	x 6
Total Eligible Recurring Costs	= \$16,014.90

One-Time Cost	
One-time Unit Cost	\$0.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$0.00
One-time Quantity	x 0
Total Eligible One-time Costs	= \$0.00
Summary	
Total Eligible Recurring Costs	\$16,014.90
Total Eligible One-time Costs	+ \$0.00
Pre-Discount Extended Eligible Line Item Cost	= \$16,014.90

Recipients of Services

BEN	Name
27825	EAST MIDDLE SCHOOL
27826	EAST MONTGOMERY HIGH SCHOOL
27849	CANDOR ELEMENTARY SCHOOL
27978	MOUNT GILEAD ELEMENTARY SCHOOL
27979	WEST MONTGOMERY HIGH SCHOOL
27980	WEST MIDDLE SCHOOL
28050	STAR BISCOE ELEMENTARY SCHOOL
28072	TROY ELEMENTARY SCHOOL
225110	PAGE STREET ELEMENTARY
16046851	MONTGOMERY LEARNING ACADEMY
16046870	GREEN RIDGE ELEM SCHOOL
16033133	MONTGOMERY COUNTY DISTRICT OFFICE

FRN Calculation for FRN #1699114434

Monthly Charges	
Total Monthly Recurring Charges	\$2,669.15
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$2,669.15
Total Number of Months of Service	x 6
Total Eligible Pre-Discount Recurring Charges	= \$16,014.90

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$16,014.90
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$16,014.90
Discount Rate	50%
Funding Commitment Request	= \$8,007.45

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Funding Request for FRN #1699114449

Funding Request Nickname: CenturyLink Local - January to June

Service Type: Voice

Agreement Information - Contract

Contract Number ITS-004467

Account Number 910.576.6511

Establishing FCC Form 470 160007778

Service Provider CenturyLink Carolina Telephone and Telegraph Co FKA Embarq (SPN: 143001484)

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Based on State Master Contract? Yes

Award Date January 25, 2016

Based on a multiple award schedule? Yes

How many bids were received for this contract? 0

Includes Voluntary Extensions? No

What is the service start date? January 01, 2017

Remaining Voluntary
Extensions

Total Remaining Contract
Length

What is the date your contract expires for the current term of the contract? June 30, 2018

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative

Local voice service for 150 users

Line Item # 1699114449.001

Product and Service Details

Function Voice

Type of Connection Local Phone Service Only

Cost Calculation for FRN Line Item # 1699114449.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$2,669.15	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$2,669.15	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 1	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$2,669.15	Total Eligible One-time Costs	= \$0.00
Months of Service	x 6	Summary	
Total Eligible Recurring Costs	= \$16,014.90	Total Eligible Recurring Costs	\$16,014.90
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discount Extended Eligible Line Item Cost	= \$16,014.90

Recipients of Services

BEN	Name
27825	EAST MIDDLE SCHOOL
27826	EAST MONTGOMERY HIGH SCHOOL
27849	CANDOR ELEMENTARY SCHOOL
27978	MOUNT GILEAD ELEMENTARY SCHOOL
27979	WEST MONTGOMERY HIGH SCHOOL
27980	WEST MIDDLE SCHOOL
28050	STAR BISCOE ELEMENTARY SCHOOL
28072	TROY ELEMENTARY SCHOOL

BEN	Name
225110	PAGE STREET ELEMENTARY
16046851	MONTGOMERY LEARNING ACADEMY
16046870	GREEN RIDGE ELEM SCHOOL
16033133	MONTGOMERY COUNTY DISTRICT OFFICE

FRN Calculation for FRN #1699114449

Monthly Charges	
Total Monthly Recurring Charges	\$2,669.15
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$2,669.15
Total Number of Months of Service	x 6
Total Eligible Pre-Discount Recurring Charges	= \$16,014.90

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$16,014.90
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$16,014.90
Discount Rate	50%
Funding Commitment Request	= \$8,007.45

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.